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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

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DEVI RAJSHRI SETHUMADHAVA MENON

Docket No. 2:21-cv-08384

Plaintiff,

- against -

**WARD CORBETT AND CATALYST
PARTNERS**

**CERTIFICATION OF DEVI
RAJSHRI SETHUMADHAVA
MENON IN SUPPORT OF THE
APPLICATION FOR DEFAULT
JUDGMENT**

Defendant.

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Pursuant to 28 U.S.C. § 1746, I, , Devi Rajshri Sethumadhava Menon, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am the Plaintiff in this action and make this certification in support of my application for default judgment against Ward Corbett and Catalyst Partners.
2. As described in the complaint, I began dating Mr. Corbett in 2019. Around July of 2019, he began asking me to invest funds with him, as he claimed to have a hedge fund.
3. At the time, Mr. Corbett had told me he lived in New York City, but never invited me to his apartment, despite our romantic relationship. All of our in person discussions would occur in my apartment, which was in Jersey City.

4. As it turned out, after we filed this action and began searching for Mr. Corbett, it became clear that he lived with his mother in Mount Vernon, New York and that he was a serial con man who had pulled the same scheme on other “girlfriends.” In fact, we discovered that he even had overlapping relationships with at least one other woman while dating me, and also defrauded that woman.
5. I initially was resistant to investing with Mr. Corbett because I had prior relationships go bad over money and I was nervous about losing the money. I communicated these concerns to Mr. Corbett.
6. I had told him that I had been victimized in the past, and he ultimately used that information to convince me that his investment would be a safe one and that I could trust him.
7. Over the next several months, he continually pressured me to invest with him, and indicated that the funds would be safe and that I could expect a strong return.
8. Yet, he never revealed what the investment actually was, as it is now apparent that there was no investment at all.
9. Due to his pressure, I ultimately caved and gave him the money, beginning with a wire transfer on September 23, 2019 in the amount of \$10,000 and then an additional wire transfer of \$90,000 to make it a total of \$100,000.
10. During the entire period, I resided in Jersey City (though I have since moved to Bayonne) and the conversations occurred in person at my residence and via whatsapp and text conversations that were directed at me in this jurisdiction. I also wired the funds from New Jersey.
11. A true copy of wire confirmations showing the deposits are annexed hereto as **Exhibit A**.

12. Annexed hereto as **Exhibit B** is a transcript of text messages that I exchanged with Mr. Corbett over the time frame documenting the facts recited herein.
13. After obtaining the funds, Corbett failed to provide any information about what occurred with the funds, where they were invested, or any account statement to demonstrate that the funds were earning anything.
14. After being evasive, on January 16, 2020, Corbett estimate that after a year, the investment would have earned 11%. On February 4, 2020, Mr. Corbett texted that “all is well” with the investment, but again without any details. On March 6, 2020 Corbett claimed that the investment was doing great because he “can short the market” and that he had been “waiting for this shorting opportunity.” No further information was provided, and I never obtained a penny back.
15. This was ironic because he had a website for Catalyst that claimed it was a “long only” fund.
16. In October 2020, I made a request to withdraw my money and received no response.
17. On December 11, 2020, Mr. Corbett asked me for more money, which I informed him could not occur without properly documenting my prior investments in his fund. He never again responded to me.
18. In addition, I took out a credit card for him to use for his business. He was supposed to pay these bills, but I was left with a total of \$7,773.89 in charges that belonged to Corbett and Catalyst.
19. The conduct here was willful and wanton as it was simply a blatant confidence scheme that resulted in the theft of over \$100,000. As such, I believe I am entitled to punitive damages.

20. I have incurred substantial legal fees and costs in this action due to Mr. Corbett's evasion of service, as set forth in the accompanying Declaration of my attorney. I ask for legal fees and my costs as set forth therein.

21. Mr. Corbett is not in active military service, as delineated in the annexed report from the Department of Defense Manpower Data Center, a true copy of which is annexed hereto as **Exhibit C**.

22. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 25, 2024.



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Devi Rajshri Sethumadhava Menon

eSignature Details

Signer ID:	wSkLeC2CnFfGuVcird5ToAEK
Signed by:	Devi Menon
Sent to email:	devi.rajshri@gmail.com
IP Address:	96.242.58.99
Signed at:	Aug 26 2024, 7:17 am EDT